

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

In re:
WELDING ROD PRODUCTS
LIABILITY LITIGATION

This Document Relates To All Cases

Case No. 1:03-CV-17000

MDL Docket No. 1535

JUDGE KATHLEEN O'MALLEY

NOTICE OF DEFENDANTS AIRGAS-GULF STATES, INC., AIR LIQUIDE AMERICA L.P., AS SUCCESSOR IN INTEREST TO BIG THREE INDUSTRIES, INC., A.O. SMITH CORPORATION, AVESTAPOLARIT WELDING, INC., THE BOC GROUP, INC., F/K/A AIRCO, INC., THE ESAB GROUP, INC., EUTECTIC CORPORATION, HOBART BROTHERS COMPANY, LINCOLN ELECTRIC COMPANY, PRAXAIR, INC., SANDVIK, INC., TDY INDUSTRIES, INC., UNION CARBIDE CORPORATION, UNION CARBIDE CORPORATION F/K/A UNION CARBIDE CHEMICALS AND PLASTICS COMPANY, INC., VIACOM, INC. AND VIACOM, INC. AS SUCCESSOR BY MERGER TO CBS CORPORATION F/K/A WESTINGHOUSE ELECTRIC CORP. PRODUCTION OF SUPPLEMENTAL CORE EXPERT REPORT

Pursuant to Section X(A) of the Case Management Order modifying the initial disclosure requirements of Federal Rule of Civil Procedure 26(a)(1), and pursuant to Sections XIII(A)(3) and XIII(C) of the Case Management Order, defendants Airgas-Gulf States, Inc., Airgas Southwest, Inc., Air Liquide America L.P., as successor in interest to Big Three Industries, Inc., A.O. Smith Corporation, Avesta Welding Produces, Inc. f/k/a Avesta Polarit Welding, Inc., The BOC Group, Inc., f/k/a Airco, Inc., The ESAB Group, Inc., Eutectic Corporation, Hobart Brothers Company, Lincoln Electric Company, Praxair, Inc., Sandvik, Inc., TDY Industries, Inc.,

Union Carbide Corporation, Union Carbide Corporation f/k/a Union Carbide Chemicals and Plastics Company, Inc., Viacom, Inc. and Viacom, Inc. as successor by merger to CBS Corporation f/k/a Westinghouse Electric Corp. hereby supplement their initial disclosure of Core Experts. A copy of this report was produced today by electronic mail to Plaintiffs' Lead Co-Counsel and Plaintiffs' Liaison Counsel.

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These Defendants reserve their right to further supplement their Core Expert Reports and their Core Experts and provide supplemental or additional expert reports pursuant to Section XIII(C) of the Case Management Order and the Federal Rules of Civil Procedure.

Dated: June 20, 2004

Respectfully submitted,

s/ John Beisner

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AMERICA L.P., AS SUCCESSOR IN
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INC., A.O. SMITH CORPORATION,
AVESTA WELDING PRODUCTS, INC.,
F/K/A AVESTA POLARIT WELDING, INC.,
THE BOC GROUP, INC. F/K/A AIRCO, INC.,
THE ESAB GROUP, INC., EUTECTIC
CORPORATION, HOBART BROTHERS
COMPANY, THE LINCOLN ELECTRIC
COMPANY, PRAXAIR, INC., SANDVIK,
INC., TDY INDUSTRIES, INC., UNION
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CARBIDE CHEMICALS AND PLASTICS
COMPANY, INC., VIACOM, INC. AND
VIACOM, INC. AS SUCCESSOR BY
MERGER TO CBS CORPORATION F/K/A
WESTINGHOUSE ELECTRIC CORP.